

STATE OF ARKANSAS  
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY8001 NATIONAL DRIVE, P.O. BOX 8913  
LITTLE ROCK, ARKANSAS 72219-8913  
PHONE: (501) 562-7444  
FAX: (501) 562-4632

May 15, 1992

Wormald U. S., Inc.  
c/o Corporation Trust Co.  
1209 Orange  
Wilmington, DE 19801OFF He shall  
54-0568  
Cedar Chemical  
1991-1992  
CAD 91-118

Re: Cedar Chemical Company Site; West Helena, Arkansas

Dear Sirs:

A chemical manufacturing facility in West Helena, Arkansas that is currently owned and operated by Cedar Chemical Corporation ("the Site") is the subject of remedial actions to remove hazardous substances, including hazardous substances related to the manufacture and disposal of dinitrobutylphenol ("dinoseb") at the plant site. These remedial actions are being taken by the current owner, Cedar Chemical Corporation, pursuant to a consent administrative order and an amended consent administrative order issued under the Arkansas Hazardous Substance Remedial Action Trust Fund Act ("ARATFA"). In the Matter of: Cedar Chemical Corporation, West Helena, Arkansas, No. LIS 91-118.

The Department has received information which indicates that Wormald U. S., Inc., as successor to The Ansul Company, is a person liable for costs of remedial actions at the Site under ARATFA, ACA §8-7-512. Pursuant to authority granted the Department under ACA §8-7-511(a), the Department requests Wormald U.S., Inc. to furnish the following information within thirty (30) days from the date of this letter:

1. Identify all past and present relationships between and among Wormald U.S., Inc., The Ansul Company and/or Eagle River Chemical Corporation.
2. Identify all persons known to you who may have knowledge, information or documents about the generation, use, storage, disposal or handling of dinoseb, drums containing dinoseb, waste containing dinoseb or crushed drums at the Site.
3. Identify all persons, including employees, agents or contractors of Wormald U.S., Inc., The Ansul Company or Eagle River

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Response  
from Lawrence  
not final

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Chemical Corporation who may have disposed of or arranged for the disposal of dinoseb, drums containing dinoseb, waste containing dinoseb or crushed drums at the Site.

4. Did Wormald U.S., Inc., The Ansul Company or Eagle River Chemical Corporation dispose of dinoseb, drums containing dinoseb, waste containing dinoseb or crushed drums at any place in Arkansas other than the Site?

5. If the answer to question no. 4 above is yes, identify all places in Arkansas other than the Site where Wormald U.S., Inc., The Ansul Company or Eagle River Chemical Corporation disposed of dinoseb, drums containing dinoseb, waste containing dinoseb or crushed drums and for each such disposal, identify the date(s) of the disposal and the transporter(s) used to transport the dinoseb, drums containing dinoseb, waste containing dinoseb or crushed drums to the other Arkansas disposal site.

6. Identify, as precisely as possible, any and all of the locations at the Site at which Wormald U.S., Inc., The Ansul Company or Eagle River Chemical Corporation disposed of dinoseb, drums containing dinoseb, waste containing dinoseb or crushed drums.

7. Do you know the final disposition of all dinoseb manufactured at the Site during the period the Site was managed or controlled by The Ansul Company or Eagle River Chemical Corporation, including all dinoseb or other substances acquired from Eagle River Chemical Corporation by The Ansul Company? If so, describe in detail, including the dates and places of, all final dispositions.

8. Do you know if any containers containing dinoseb were disposed of at the Site? If so, describe the type, condition and number of containers in which dinoseb was contained when it was disposed of at the Site, including, if possible, any labels, numbers or other markings on the containers.

9. Do you know if any containers containing dinoseb were disposed of at any place in Arkansas other than the Site? If so, describe the type, condition and number of containers in which dinoseb was contained when it was disposed of at places in Arkansas other than the Site, including, if possible, any labels, numbers or other markings on the containers.

10. Provide all documents which support any of your responses to questions nos. 1 through 9.

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Please be advised that you are required by ARATFA to provide the information requested herein. Violations of the Act are punishable by civil penalties up to twenty-five thousand dollars (\$25,000) per day for each day of any violation as well as criminal prosecution.

Information and documents provided in response to this letter must be delivered to Arkansas Department of Pollution Control and Ecology within thirty (30) days from the date of this letter and should be delivered to:

Anne Roberts Bobo  
Attorney  
Arkansas Department of Pollution Control  
and Ecology  
P. O. Box 8913  
Little Rock, Arkansas 72219

Sincerely,

*Randall Mathis*

Randall Mathis  
Director

RM/AB/pn

cc: Mr. Peter Flemister, Esq.  
Allied Tube & Conduit Company  
16100 Lanthrop Avenue  
Harvey, IL 60624